

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

JANE DOE as Next Friend of  
MINOR DOE, a Minor,

Plaintiff,

Case No. 1:22-cv-11818  
Hon. Thomas L. Ludington

v.

DEBRA LEINER, JAMES BAILEY, and  
D. BRUCE MARTIN, in their Official  
and Individual capacities, and SAGINAW  
TOWNSHIP COMMUNITY SCHOOLS,

Defendants.

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THE MASTROMARCO FIRM  
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**PLAINTIFF'S MOTION TO FILE EXHIBIT UNDER SEAL IN**  
**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL**

NOW COMES the Plaintiff, JANE DOE, by and through her attorneys, THE  
MASTROMARCO FIRM, and for her motion states more fully as follows:

1. Pursuant to Local Rule 7.1, concurrence was sought with regards to Plaintiff's request to have the identified documents filed under seal and concurrence was obtained.
2. That on February 16, 2023, Plaintiff filed her response to Defendants Motion to Compel. (See ECF #28).
3. That Plaintiff inadvertently included an exhibit in her response that contained interrogatory answers.
4. That the name of the Plaintiff and the next of friend is displayed in the interrogatory answers.
5. That there is an order granting Plaintiff's motion for a Protective Order and to Proceed Under a Pseudonym. (See ECF #11).
6. That Plaintiff is asking this Honorable Court to either place Exhibit #1 in ECF #28 under seal or to strike Plaintiff's entire response in ECF #28 and let Plaintiff refile the response with proper redactions.

WHEREFORE, the Plaintiff respectfully requests that this motion be granted.

Respectfully submitted,  
THE MASTROMARCO FIRM

Dated: February 21, 2023

/s/ Rikki Mays-Reak  
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**PLAINTIFF'S BRIEF IN SUPPORT**

The Plaintiff hereby relies upon the authority and arguments presented in its Motion above. Further, Plaintiff relies upon the Federal Rules of Civil Procedure.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court issue an order granting Plaintiff's Motion and requested relief.

Respectfully submitted,  
THE MASTROMARCO FIRM

Dated: February 21, 2023

/s/ Rikki Mays-Reak  
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**CERTIFICATE OF SERVICE**

I hereby certify that on **February 21, 2023**, I presented the foregoing papers to the Clerk of the Court for the filing and uploading to the CM/ECF system, which will send notification of such filing to the following: **Gregory W. Mair & Kailen C. Piper**.

THE MASTROMARCO FIRM

*/s/ Rikki Mays-Reak*

Attorney for Plaintiff